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District of Nevada

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

PAMELA MARIE CAGLIARI,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Deputy Commissioner for Operations,  
performing the duties and functions not  
reserved to the Commissioner of Social  
Security,,

Defendant.

)  
) Case No. 2:18-cv-00130-GMN-CWH  
)

) **DEFENDANT'S UNOPPOSED MOTION FOR**  
) **EXTENSION OF TIME (FIRST REQUEST)**  
)

1 Defendant Nancy A. Berryhill, Deputy Commissioner for Operations, performing the duties  
2 and functions not reserved to the Commissioner of Social Security (Defendant), respectfully requests a  
3 30-day extension of time, from April 17, 2018 to May 17, 2018, for Defendant to answer the  
4 complaint and submit the certified administrative record (CAR) in the above-captioned case.

5 This is Defendant's first request for an extension of time. Defendant respectfully submits that  
6 the requested extension is necessary to allow the Commissioner to prepare the CAR for submission to  
7 this Court and parties in this action. It has taken longer than anticipated to prepare the CAR despite  
8 the Commissioner's diligent efforts to have it ready in time. This request is made in good faith with  
9 no intention to unduly delay the proceedings.

10 On April 12, 2018, Plaintiff's counsel indicated via email that Plaintiff does not oppose this  
11 motion or the requested extension.

12 Respectfully submitted,

13 Dated: April 12, 2018

14 DAYLE ELIESON  
United States Attorney

15 By: /s/ Margaret Branick-Abilla  
16 MARGARET BRANICK-ABILLA  
Special Assistant United States Attorney  
Attorneys for Defendant

17 OF COUNSEL TO DEFENDANT:

18 DEBORAH LEE STACHEL  
19 Regional Chief Counsel, Region IX  
Social Security Administration

20  
21 IT IS SO ORDERED:

22   
23 \_\_\_\_\_  
24 HON. CARL W. HOFFMAN  
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: April 13, 2018  
\_\_\_\_\_

1 **CERTIFICATE OF SERVICE**

2 I, Margaret Branick-Abilla, certify that the following individual(s) was served with a copy of  
3 the **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST**  
4 **REQUEST)** on the date and via the method of service identified below:

5 **CM/ECF:**

6 Cyrus Safa  
7 Email: cyrus.safa@rohlflinglaw.com  
8 Attorney for Plaintiff

9 Gerald Welt  
10 Email: gmwesq@weltlaw.com  
11 Attorney for Plaintiff

12 Date: April 12, 2018

13 /s/ Margaret Branick-Abilla  
14 MARGARET BRANICK-ABILLA  
15 Special Assistant United States Attorney  
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